

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TRAXCELL TECHNOLOGIES, LLC.,)	
Plaintiff,)	
)	Civil Action No. 6:21-cv-00023-ADA
v.)	
)	
GOOGLE LLC)	Jury Trial Demanded
Defendant.)	

**PLAINTIFF’S UNOPPOSED MOTION TO DISMISS CERTAIN CLAIMS OF
INFRINGEMENT**

Plaintiff respectfully files this Unopposed Motion to Dismiss Certain Claims of Infringement from this lawsuit, without prejudice. Specifically, Plaintiff is withdrawing its claims of infringement against Google LLC (“Defendant”) for U.S. Pat. No. 9,549,388 (“Dismissed Patent”), without prejudice to refiling. Plaintiff has evaluated its case after the Federal Circuit decisions in an earlier wave of litigation¹ and is trying to remove issues in the present case.

CONCLUSION

For all the above reasons, Traxcell respectfully requests the Court dismiss without prejudice Plaintiff’s claims of infringement for U.S. Pat. No. 9,549,388 against Defendant.

Respectfully submitted,

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By: /s/ William P. Ramey, III
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¹ *Traxcell Techs., LLC v. Sprint Communs. Co. LP*, Nos. 2020-1852, 2020-1854, 2021 U.S. App. LEXIS 30422 (Fed. Cir. Oct. 12, 2021) and *Traxcell Techs., LLC v. Nokia Sols. & Networks Oy*, Nos. 2020-1440, 2020-1443, 2021 U.S. App. LEXIS 30421 (Fed. Cir. Oct. 12, 2021).

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for defendants on October 21, 2021, via e-mail, and they are unopposed.

/s/ William P. Ramey, III
William P. Ramey, III

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served today, October 21, 2021, with a copy of the foregoing via the Court's CM/ECF system.

/s/ William P. Ramey, III
William P. Ramey, III